

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA

League of Women Voters of Arizona,

Plaintiff,

vs.

Lions of Liberty LLC; Yavapai County  
Preparedness Team; Jim Arroyo, Lucas  
Cilano; Nicholas Cilano; Brian Mounsey;  
Toby Fox; Bruce Mounsey; James Johnson;  
Melody Jennings; Clean Elections USA;  
John Does 1-10,

Defendants.

No. 3:22-cv-08196

**DECLARATION OF  
DONALD C. OVERLOCK**

I, Donald C. Overlock, declare as follows:

1. I am 72 years old, have personal knowledge of the matters stated in this Declaration, and could and would competently testify to these facts.
2. I am a United States citizen and currently reside in Mesa, Arizona, where I have lived for the last twenty-six years.
3. I have been voting since I was twenty-one years old. When I first voted, a voter had to be twenty-one to be eligible to vote.
4. For the past ten years, I have voted using mail-in ballots. I am on the state's Active Early Voting List, which automatically sends out mail-in ballots to those who are registered.
5. I have used a ballot drop box twice in the past without incident.

- 1 6. Around 12:30 pm on Thursday, October 20<sup>th</sup>, 2022, I drove with my wife to the  
2 Mesa Juvenile Court to deposit our ballots for the 2022 general election. I  
3 noticed a truck in the parking lot, with five or six men standing around the truck.  
4 The truck was parked in the second row of parking spaces directly across from  
5 the drop box's location.
- 6 7. The men appeared to be about twenty to thirty years in age. I didn't see if they  
7 had any weapons, but I was not actively looking for any weapons.
- 8 8. My wife parked the car, and my wife and I both went to individually drop off our  
9 own ballots. We both had seen news coverage of people being photographed for  
10 dropping off ballots and didn't want to be targeted.
- 11 9. After returning to our car, my wife noticed that two men began taking  
12 photographs of our license plate after we arrived. I confronted them to ask why  
13 they were taking photographs of my car. They responded that they were  
14 photographing us to provide election security.
- 15 10. I told them I was going to take a picture of them too and that I would be  
16 reporting them for voter intimidation and harassment. The men appeared to be  
17 angry in response to this.
- 18 11. I returned to my car and the men continued to either record or photograph my car  
19 as we drove away. When I arrived back home, I called the Secretary of State's  
20 office and reported the incident.
- 21 12. I had heard of such conduct taking place, but never personally experienced it. It  
really bothered me and made me very uncomfortable.

1 13. I did go through with voting but I am worried that this group took down my  
2 license plate number and photographed my wife and me. I am concerned they  
3 might use my license plate to try to find my address to harass me and my wife in  
4 person, especially since they reacted badly when I photographed them.

5 14. I am also concerned that someone who is less confident than I am would have  
6 just decided not to vote rather than doing so while being watched and  
7 photographed.

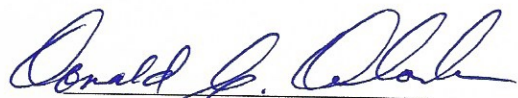
8 15. If the voter had been an elderly woman or a young person voting for the first  
9 time, the sight of half-a-dozen men taking photographs might scare them away  
10 from voting. That thought makes me truly angry.

11 16. While I am still concerned that these individuals might try to use my personal  
12 information, I believe it is more important to take a stand against voter  
13 intimidation.

14 17. It is wrong for these groups to make people uncomfortable and try to scare them  
15 off from voting. I will not stand by while these groups try to infringe on my right  
16 to vote or the right of other Americans to do the same.

17 I declare under penalty of perjury that the foregoing Declaration is true and correct.  
18

19 Executed on October 27, 2022.



20 Donald C. Overlock  
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